

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SERGIO BONILLA, on behalf of himself and all others similarly situated,

Plaintiff,

v.

ANCESTRY.COM OPERATIONS INC., a Virginia Corporation; ANCESTRY.COM INC., a Delaware Corporation; ANCESTRY.COM LLC, a Delaware Limited Liability Company; and DOES 1 through 50, inclusive,

Defendants.

CASE NO. 1:20-cv-07390

Hon. Virginia M. Kendall

**JOINT MOTION FOR ENTRY OF AGREED CONFIDENTIALITY ORDER AND
ORDER GOVERNING THE DISCOVERY OF ELECTRONICALLY STORED
INFORMATION**

Defendants Ancestry.com Operations Inc., Ancestry.com Inc., and Ancestry.com LLC (collectively, “Ancestry”) and plaintiff Sergio Bonilla (together, the “Parties”), hereby jointly move this honorable Court to enter the proposed protective order and the proposed order governing the discovery of electronically stored information.¹ In support of their motion, the Parties state as follows:

1. Pursuant to Rule 26(c)(1) of the Federal Rules of Civil Procedure, good cause exists for the entry of the proposed protective order, which is based on the Form LR 26.2 Model Confidentiality Order, to ensure that disclosure of confidential information produced by parties and non-parties in this proceeding is appropriately protected.

¹ Word versions of the proposed orders and a redline showing the modifications to the Form LR 26.2 Model Confidentiality Order have been submitted via e-mail to the Court’s Proposed Order mailbox.

2. As the redline shows, the main modification to the Model Confidentiality Order was the creation of a highly confidential category, which provides protection for highly confidential information, such as trade secrets and other highly sensitive information.

3. The Parties also hereby move the Court to enter the agreed stipulation and proposed order governing the discovery of electronically stored information, which the Parties agreed sets forth the specifications that shall govern document production during discovery in the above-captioned action.

Accordingly, the Parties respectfully request that the Court enter the proposed protective order and the proposed order governing the discovery of electronically stored information.

Respectfully submitted.

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By: /s/ Shon Morgan
Shon Morgan

Dated: March 2, 2022

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By: /s/ Benjamin R. Osborn
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Dated: March 2, 2022

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on March 2, 2022, I caused a true and correct copy of the foregoing to be filed electronically with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to counsel of record via the Court's CM/ECF automated filing system.

/s/ Shon Morgan
Shon Morgan